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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**

11 Abdi Nazemian, et al.,  
12 Plaintiffs,

13 vs.

14 NVIDIA Corporation,  
15 Defendant.

16 Andre Dubus III, et al.,  
17 Plaintiffs,

18 vs.

19 NVIDIA Corporation,  
20 Defendant.

Case No. 4:24-cv-01454-JST  
Case No. 4:24-cv-02655-JST

21  
22 **JOINT STIPULATION AND ~~PROPOSED~~**  
23 **ORDER RE ESI PROTOCOL AND**  
24 **PROTECTIVE ORDER SCHEDULE**

25 Judge: Hon. Jon S. Tigar  
26 Courtroom: 6 - 2nd Floor  
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1 Pursuant to Civil Local Rule 7-12 and the Court's Minute Entry for proceedings held on October  
2 21, 2024, (ECF No. 80), the undersigned Parties to the above-captioned action, by and through their  
3 respective counsel of record, hereby stipulate the following:

4 1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar  
5 for an Initial Case Management Conference, (ECF No. 66);

6 2. WHEREAS, on September 9, 2024, the Court ordered the Parties to meet and confer on a  
7 proposed protective order and ESI protocol order, and established a schedule and requirements for  
8 submitting briefs if Parties could not reach agreement, (ECF No. 68);

9 3. WHEREAS, the Parties submitted their respective ESI protocol and protective order  
10 proposals and accompanying briefs on September 9, 2024, (ECF Nos. 73, 74), and responses and  
11 supplemental submissions thereafter (ECF Nos. 75, 76, 79);

12 4. WHEREAS, on October 21, 2024, the Parties appeared before the Court to present  
13 arguments regarding their respective ESI protocols and protective order proposals (ECF No. 80);

14 5. WHEREAS, the Court directed the Parties to further meet and confer to resolve disputed  
15 issues in their respective ESI protocol and protective order proposals, and to submit a stipulation or  
16 competing proposals with accompanying briefs by November 4, 2024 (ECF No. 80);

17 6. WHEREAS, on November 4, 2024 the Parties stipulated to extend the deadline for  
18 submitting a stipulation or competing proposals with accompanying briefs from November 4, 2024 to  
19 November 14, 2024 (ECF No. 84), which was ordered by the Court on November 5, 2024 (ECF No. 85);

20 7. WHEREAS, the Parties have engaged in five (5) meet and confer conferences for over five  
21 hours collectively and exchanged numerous redlined drafts of the ESI protocol and protective order  
22 proposals since October 21, 2024, and have made significant progress toward narrowing the disputed  
23 issues in the respective proposals; and

24 8. WHEREAS, the Parties believe that they can make additional progress by continuing to  
25 meet and confer on the remaining disputed issues.

26 NOW, THEREFORE IT IS HEREBY STIPULATED, by and between the Parties and their  
27 respective counsel, that the Parties' deadline to submit a stipulation, or competing proposed ESI  
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1 Protocols, Protective Orders, and supportive briefs not to exceed 5 pages, shall be extended from  
2 November 14, 2024 to November 18, 2024.

1 Dated: November 14, 2024

Respectfully submitted,

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1 Dated: November 14, 2024

Respectfully submitted,

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1 Dated: November 14, 2024

Respectfully Submitted,

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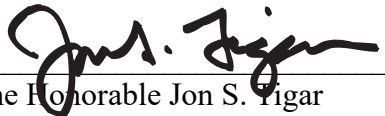
23 *Attorneys for Defendant NVIDIA Corporation*

**~~[PROPOSED]~~ ORDER**

Pursuant to the stipulation of the Parties, and for good cause appearing, it is hereby ORDERED that the Parties deadline for filing a stipulated ESI Protocol and stipulated Protective Order, or filing the Parties' respective proposals and briefs shall be continued to November 18, 2024.

**IT IS SO ORDERED.**

Dated: November 15, 2024

  
\_\_\_\_\_  
The Honorable Jon S. Figar  
U.S. District Court Judge

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: November 14, 2024

/s/ Joseph R. Saveri  
Joseph R. Saveri